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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

2010 DEC 15 PM 3:10

**SA 10 CR 1088 OLG**

UNITED STATES OF AMERICA, ) 18 U.S.C. § 1951: Extortion  
) by Wrongful Use of Force  
Plaintiff, ) Threats and Violence;  
) 18 U.S.C. § 1957: Laundering  
v. ) of Monetary Instruments; 18  
) U.S.C. § 2: Aiding and  
**MAURICIO SANCHEZ-GARZA, (1)** ) Abetting; 18 U.S.C. §§ 981 &  
**JORGE VAZQUEZ SANCHEZ, (2)** ) 982: Demand for Criminal  
) Forfeiture.]  
Defendants. )

THE GRAND JURY CHARGES:

**COUNT ONE**  
**[18 U.S.C. § 1951]**  
**18 U.S.C.**

Beginning on or about the May 25, 2008, the exact date unknown to the Grand Jury, and continuing until on or about June 14, 2008, the exact date unknown to the Grand Jury, in the Western District of Texas and in divers other places, the defendants,

**MAURICIO SANCHEZ-GARZA,**  
**JORGE VAZQUEZ SANCHEZ,**

did obstruct, delay and affect, attempt to obstruct, delay and affect, and conspire to obstruct, delay and affect commerce and the movement of articles and commodities in commerce by extortion, as those terms are defined in Title 18, United States Code, Section 1951, that Defendants obtained, attempted to obtain, and conspired to obtain the property of Arturo Madrigal,

with Arturo Madrigal's consent induced by the wrongful use of force, violence, and fear, in violation of Title 18, United States Code, Sections 1951 and 2.

**COUNT TWO**  
**[18 U.S.C. § 1957]**

On or about August 28, 2008, in the Western District of Texas, Defendants,

**MAURICIO SANCHEZ-GARZA,  
JORGE VAZQUEZ SANCHEZ,**

did knowingly engage and attempt to engage in a monetary transaction, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000.00, that is the deposit of funds in the amount of \$925,315.00, such property having been derived from a specified unlawful activity, that is, the extortion by force, threats and violence contrary to Title 18, United States Code, Section 1951.

In violation of 18, United States Code, Sections 1957 and 2.

**NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE**

**I.**

**Extortion by Wrongful Use of Force, Threats  
and Violence Violations and Forfeiture Statutes**  
**[Title 18 U.S.C. § 1951; subject to forfeiture pursuant to Title  
18 U.S.C. § 981(a) (1) (C), made applicable  
by Title 28 U.S.C. § 2461; see Fed. R. Crim. P. 32.2]**

As a result of the foregoing criminal violations set forth in Count One, which are punishable by imprisonment for more than

one year, **DEFENDANTS MAURICIO SANCHEZ-GARZA, (1) and JORGE VAZQUEZ SANCHEZ, (2)** shall forfeit to the United States the below-described property pursuant to Title 18 U.S.C. § 981(a)(1)(C), which states the following:

**Title 18 U.S.C. § 981**

(a)(1) The following property is subject to forfeiture to the United States:

(C) Any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of section . . . of this title or any offense constituting "specified unlawful activity" (as defined in section 1956(c)(7) of this title), or a conspiracy to commit such offense.

**II.**

**Laundering of Monetary Instruments  
Violations and Forfeiture Statutes**

**[Title 18 U.S.C. § 1957; subject to forfeiture pursuant to Title 18 U.S.C. § 982(a)(1); see Fed. R. Crim. P. 32.2]**

As a result of the foregoing criminal violation set forth in Count Two (2), which is punishable by imprisonment for more than one year, **DEFENDANTS MAURICIO SANCHEZ-GARZA, (1) and JORGE VAZQUEZ SANCHEZ, (2)** shall forfeit to the United States the below-described property pursuant to Title 18 U.S.C. § 982(a)(1), which states the following:

**Title 18 U.S.C. § 982. Criminal Forfeiture**

(a)(1) The court, in imposing sentence on a person convicted of an offense in violation of section . . . 1957 . . . of this title, shall order that the person forfeit to the United States any property, real or personal, involved in such offense, or any property traceable to such property.

This Notice of Demand for Forfeiture includes but is not limited to the property described below.

III.

Real Properties

All right, title and interest of DEFENDANTS MAURICIO SANCHEZ-GARZA, (1) and JORGE VAZQUEZ SANCHEZ, (2) in the following real properties is subject to forfeiture to the United States of America:

Real Properties located and situated at 6451 Babcock Road and 6301 Melissa Ann Street, San Antonio, Bexar County, Texas, more specifically described as 37.286 acres out of NCB 17204 and 14862, further described by Bexar County Property ID Numbers: 562130; 562131; 562164; 562302; 646038; and 1122127.

RESERVATIONS FROM AND EXCEPTIONS TO CONVEYANCE AND WARRANTY FOR ALL OF THE AFOREMENTIONED REAL PROPERTIES: Easements, rights-of-way, and prescriptive rights, whether of record or not; all presently recorded instruments, other than liens and conveyances, that affect the property.

IV.

Money Judgment

All right, title and interest of DEFENDANTS MAURICIO SANCHEZ-GARZA, (1) and JORGE VAZQUEZ SANCHEZ, (2) in the following money judgment is subject to forfeiture to the United States of America:

A sum of money equal to **Four Million, Five Hundred Thousand Dollars and No Cents (\$4,500,000.00)**, representing the amount of proceeds involved in or traceable to violations set out in the above-described Counts for which **DEFENDANTS MAURICIO SANCHEZ-GARZA, (1)** and **JORGE VAZQUEZ SANCHEZ, (2)** are jointly and severally liable.

V.

Substitute Assets

If any of the property described in paragraphs III and IV as being subject to forfeiture for violations of Title 18 U.S.C. § 1951 and subject to forfeiture pursuant to Title 18 U.S.C. § 981(a)(1)(C), made applicable by Title 28 U.S.C. § 2461 and Title 18 U.S.C. § 1957 and subject to forfeiture pursuant to Title 18 U.S.C. § 982(a)(1), as a result of any act or omission of **DEFENDANTS MAURICIO SANCHEZ-GARZA, (1)** and **JORGE VAZQUEZ SANCHEZ, (2)**:

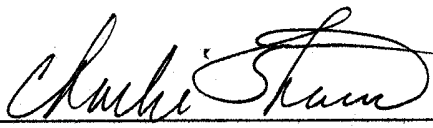
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States of America to seek the forfeiture of any other property of **DEFENDANTS MAURICIO SANCHEZ-GARZA, (1)** and **JORGE VAZQUEZ SANCHEZ, (2)**, up to the value of said property as substitute assets pursuant to Fed. R. Crim. P. 32.2(c)(1) and Title 21 U.S.C. § 853(p).

A TRUE BILL

FOR PERSON

JOHN E. MURPHY  
United States Attorney

By:   
CHARLIE STRAUSS  
Assistant United States Attorney